

UNITED STATES DISTRICT COURT

for the
Southern District of OhioIn the Matter of the Tracking of
(Identify the person to be tracked or describe
the object or property to be used for tracking)FORD SEDAN WITH OHIO LICENSE NUMBER
HNC4506, VIN # 3FA6P0HD8HR313456Case No. 2:21-mj-354

APPLICATION FOR A TRACKING WARRANT

I, a federal law enforcement officer or attorney for the government, have reason to believe that the person, property, or object described above has been and likely will continue to be involved in one or more violations of 21 U.S.C. § 846. Therefore, in furtherance of a criminal investigation, I request authority to install and use a tracking device or use the tracking capabilities of the property or object described above to determine location. The application is based on the facts set forth on the attached sheet.

- ☒ The person, property, or object is located in this district.
☐ The person, property, or object is not now located in this district, but will be at the time of execution.
☐ The activity in this district relates to domestic or international terrorism.
☐ Other:

The tracking will likely reveal these bases for the warrant under Fed. R. Crim. P. 41(c): (check one or more)

- ☐ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☒ a person to be arrested or a person who is unlawfully restrained.

☒ I further request, for purposes of installing, maintaining or removing the tracking device, authority to enter the following vehicle or private property, or both:

8312 Tegmen St, Columbus, Ohio 43240

☒ Delayed notice of 30 days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

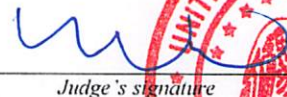


Applicant's signature

Paul Mills

Applicant's printed name and title

Sworn to before me and signed in my presence.

Date: 5-20-21City and state: Columbus, OH


Judge's signature

Judge Chelsey M. Vascura

Printed name and title



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

IN THE MATTER OF THE TRACKING OF
FORD SEDAN WITH OHIO LICENSE
NUMBER HNC4506, VIN #
3FA6P0HD8HR313456

Case No. _____

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Paul Mills, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant under Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 3117 to authorize the installation and monitoring of a tracking device on a ^{Ford CMV} ~~Honda~~ sedan with Ohio license plate HNC4506 and vehicle identification number 3FA6P0HD8HR313456 ("the SUBJECT VEHICLE"). Based on the facts set forth in this affidavit, I believe that the SUBJECT VEHICLE is presently being used in furtherance of 21 U.S.C. §§ 841 and 846, conspiracy to possess with intent to distribute 400 grams or more of a mixture or substance containing Methamphetamine and that there is probable cause to believe that the installation of a tracking device on the SUBJECT VEHICLE and use of the tracking device will lead to evidence, fruits, and instrumentalities of the aforementioned crimes as well as to the identification of individuals who are engaged in the commission of those and related crimes.
2. Your affiant is with Homeland Security Investigations (HSI). I am currently assigned to a Bulk Cash and Drug Smuggling Group. I have been with HSI since June of 2010 and

prior to that I worked investigations as a deputy at Morrow County Sheriff's Office in the State of Ohio for twelve years. I have advanced training and experience working smuggling organizations along with money laundering, cyber and electronic crime, surveillance and technical surveillance, interview and interrogation, search and seizure warrants and fraud investigations. Your affiant is responsible for enforcing federal criminal statutes, as defined in 18 U.S.C. 2510(7), including, but not limited to, controlled substance violations, pursuant to 21 U.S.C. §§ 841 and 846.

3. While employed as a Special Agent, your affiant has conducted and participated in numerous investigations of criminal activity, including, but not limited to, controlled substance violations. During the investigation of these cases, your affiant has executed, or participated in the execution of, numerous search warrants and seized evidence of these violations.
4. Your Affiant is familiar with the operation of illegal drug trafficking organizations in central Ohio.
5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

6. On April 1, 2021, HSI Indianapolis contacted HSI Columbus and advised that they had interdicted a semi hauling cars and had located approximately 50 pounds of methamphetamine and one kilogram of cocaine hidden in one of the vehicles. That

vehicle was to be transported to 1117 Polaris Parkway, Columbus, Ohio, where an individual would pick it up. HSI Indianapolis followed the semi to the Indiana/Ohio state line where HSI Columbus picked up the surveillance.

7. At approximately 1900, the semi-truck driver contacted the subject that was to pick up the vehicle, at 470-460-0353, and advised that he/she was 10 minutes away from the drop off location. At approximately 1912, the semi pulled into the drop-off location and removed the vehicle containing the narcotics from the trailer.
8. After waiting for 30 minutes, the semi-truck driver placed another call and subject stated that they were one minute out. At approximately 1942, a gray Ford Focus, with Ohio license plate HNC4506, pulled into the area, near the semi and parked. The semi-truck driver then got another call from the subject and advised him/her to drive the vehicle (with the narcotics) over by the gas pumps. When the semi-truck driver pulled away in the vehicle with the narcotics, the Ford Focus pulled next to an unmarked law enforcement vehicle that was sitting in that area of the semi. An individual exited the vehicle and was described by agents as a dark black male with a hooded black and gold jacket. The unidentified male then looked into the windows of the aforementioned law enforcement vehicle and then walked to the passenger side of his Ford Focus and pretended to urinate. During that time, surveillance observed a black female passenger counting a stack of US currency in the Ford Focus. The driver then returned to the Ford Focus and departed the area. After approximately 10 minutes the semi-truck driver called the subject again who advised that he had to have someone else come pick up the vehicle (containing the narcotics) and he would call and find where they are and then call back.

9. After waiting another 20 minutes, the semi-truck driver attempted numerous times to call the subject's phone about picking up the vehicle, but the calls were never answered. The semi-truck driver made one final call and left a message advising that he/she was loading the vehicle back on the truck and leaving.
10. On April 6, 2021, agents reviewed video from the area and confirmed the plate of the SUBJECT VEHICLE. A search of Law Enforcement databases found that the Ford Focus was registered to Hasson JAH. A photo of JAH was obtained by agents and it was determined that the photo and the height and weight of JAH were consistent to the subject driving the Ford Focus but could not be sure.
11. On April 6, 2021, agents from Indianapolis contacted SA Mills and advised that the SUBJECT had contacted the semi driver and advised that he had come to pick up the vehicle (containing the narcotics) but he thought that there were cops in the area. The semi driver advised the subject that after he left the area, police stopped him and seized the vehicle.
12. On April 7, 2021, SA Mills sent a subpoena to AT&T for subscriber and call information on 470-460-0353. On April 27, 2021, information from AT&T was returned and found that the phone was a pre-paid phone with no subscriber information. It had been activated on February 15, 2021. The only numbers that were in contact with the target phone, that could be verified, belonged to the semi-truck driver and Alexis Rae MOBLEY.
13. On April 27, 2021, agents used law enforcement databases to identify addresses associated with JAH and MOBLEY. Agents conducted surveillance of those addresses in an attempt to locate the SUBJECT VEHICLE, JAH and/or MOBLEY.

in order to reduce the likelihood of suspects observing investigators as they install/maintain/remove the tracking device.

18. In the event the Court grants this application, there will be periodic monitoring of the tracking device during both daytime and nighttime hours for a period not to exceed 45 days following issuance of the warrant. The tracking device may produce signals from inside private garages or other such locations not open to the public or visual surveillance.

AUTHORIZATION REQUEST

19. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 3117, that authorizes members of Homeland Security Investigations or their authorized representatives, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to install a tracking device on the SUBJECT VEHICLE within The Southern District of Ohio within 10 days of the issuance of the proposed warrant, to maintain, repair, and/or replace the tracking device as necessary, and to remove the tracking device from the SUBJECT VEHICLE after the use of the tracking device has ended during both daytime and nighttime hours; and/or move the SUBJECT VEHICLE to effect the installation, repair, replacement, and removal of the tracking device; and to monitor the tracking device for a period of 45 days following the issuance of the warrant, including when the tracking device is inside private garages and other

14. On May 17, 2021, SA Mills located the SUBJECT VEHICLE at 8312 Tegmen St, Columbus, Ohio. According to law enforcement databases, Mohamad KAMARA, AKA Hassam KAMARA, currently lives at the residence. KAMARA has numerous previous addresses with MOBLEY. KAMARA also fits the description of the individual seen on April 1, 2021 at 1117 Polaris Parkway, Columbus, Ohio.
15. Based on my own observations, I know that the SUBJECT VEHICLE is presently within the Southern District of Ohio.
16. In order to effectively track the movement of the SUBJECT VEHICLE for the purpose of further investigating the unlawful activities, including but not limited to trafficking in controlled substances, as well as confirming the target of the investigation and the unlawful activities of any other co-conspirators who may use the SUBJECT VEHICLE, and to decrease the chance of detection, I seek authorization to place a tracking device on the SUBJECT VEHICLE while it is in the Southern District of Ohio. Because owner/driver(s) can park the SUBJECT VEHICLE in driveways and on other private property, it may be necessary to enter onto private property and/or move the SUBJECT VEHICLE to effect the installation, repair, replacement, and removal of the tracking device. The SUBJECT VEHICLE is currently parked near an apartment located at 8312 Tegmen St, Columbus, Ohio.
17. To ensure the safety of the executing officer(s) and to avoid premature disclosure of the investigation, it is requested that the court authorize installation, maintenance, and removal of the tracking device during both daytime and nighttime hours. Your affiant requests authority to install/maintain/remove the tracking device outside daytime hours,

locations not open to the public or visual surveillance, both within and outside the Southern District of Ohio.

20. In accordance with 18 U.S.C. § 3103a(b) and Federal Rule of Criminal Procedure 41(f)(3), I further request that the warrant delay notification of the execution of the warrant for 30 days after the end of the authorized period of tracking (including any extensions thereof) because there is reasonable cause to believe that providing immediate notification may have an adverse result, as defined in 18 U.S.C. § 2705. Providing immediate notice would seriously jeopardize the ongoing investigation by prematurely revealing its existence and giving suspects an opportunity to flee from prosecution, destroy or tamper with evidence, intimidate potential witnesses, notify confederates, and change patterns of behavior.

Respectfully submitted,



Paul Mills
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me on May 20, 2021.



Judge Chelsey M. Vascura
United States Magistrate Judge